Kerr, Michelle

From: Patrick Steerman [psteerman@charter.net]
Sent: Monday, June 03, 2013 9:15 AM
To: Kerr, Michelle
Subject: Re: Draft comments on updated risk assessments to TI [Chemical Recovery Systems]

Thanks Michelle. I will pass this along.

I received the final version of the response to other comments (non-risk assessment) and hope to submit those responses by mid-week, hopefully earlier.

Best Regards,

Pat

Patrick S. Steerman

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Pat, please see Keith's note below. Upon further review, this particular item (the calculation) is no longer an issue. If Tom Bicksey has additional questions, he is welcome to contact Keith directly.

Sincerely,

Michelle Kerr
U.S. EPA Region 5 Superfund Division
Remedial Project Manager
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From: Fusinski, Keith
Sent: Tuesday, May 28, 2013 7:26 AM
To: Kerr, Michelle
Subject: RE: Draft comments on updated risk assessments to TI [Chemical Recovery Systems]

Michelle,

US EPA concurs with the original response to comment 27. Appendix C. Table 16. for the TI waiver for CRS.

Keith Fusinski, PhD, MT(ASCP)
Toxicologist
U.S. EPA Region V
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From: Kerr, Michelle
Sent: Tuesday, May 14, 2013 12:09 PM
To: Patrick Steerman
Cc: larry.antonelli@epa.state.oh.us; Fusinski, Keith; edward_karecki@fws.gov
Subject: Draft comments on updated risk assessments to TI [Chemical Recovery Systems]

Pat, below are some issues we see in the response to comments on the risk assessment portion of the TI assessment. This is a draft, subject to further input from Ohio EPA. I think it would be useful for us to have a small technical meeting so that our respective risk assessment staff can discuss the points. Please contact me if you agree and to coordinate.

Human Health Risk Assessment (HHRA) Update

18. Section 6.1.1 of TI Waiver. Acknowledge in an Uncertainties section that if site conditions change so as to affect migration of volatile organic compounds (VOCs) so that they would volatilize upon reaching surface water of the river, this may render an additional possible pathway of exposure to juvenile trespassers.

19. Section 6.1.1 of TI Waiver. Acknowledge in an Uncertainties section that if site conditions change so as to affect increases in flux to the river such potential scenarios may affect potential future risk.

20. Section 6.1.1 of TI Waiver. In light of new information being available regarding groundwater and its potential impacts to sediment and surface water, it makes sense to add updated potential risk to previously estimated risks for juvenile trespassers in the 2006 HHRA. If contaminant levels indicate no risk in surface water, acknowledge that. Also, address what the total risk to a juvenile trespasser was in the baseline risk assessment compared to what it is in the update.

21. Section 6.1.1 of TI Waiver. Response to comment 20 above is also pertinent for this comment.

23. Appendix C. Page 5 Last Paragraph. Table 10 does not address the exposure pathways; should the reference be revised to Table 9? This response does not address the fact that a conceptual site model is based upon current conditions and should not be modified based upon selected future remedies. Is there a better term to use in this instance?

27. Appendix C. Table 16. US EPA disagrees with this response to this comment . US EPA used the exact equations described in the HHRA to calculate risk. As can be seen from column "C" of the dermal spreadsheet that was attached with the submitted comments, ABS was included in the calculations for dermal risk. Therefore, this comment still needs to be addressed.

Appendix C. Page 5 Second Paragraph. First Sentence. Typographical error. Change "HRHA" to "HHRA". This comments was not addressed.

Appendix C. Page 8. Second paragraph. Fourth sentence. Circular reference. This sentence states; "A comparison of the toxicological values used in the 2006 HHRA to current toxicological criteria is presented in **Appendix C** *(to this HHRA Update)*". Please correct reference.

Screening Level and Ecological Risk Assessment (SLERA) Update

30. Section 6.2.1. The upstream sediment sample from the unpublished Ohio EPA study is located approximately 1Ž2 mile upstream of the site. There are sources located within that distance that could influence sediment quality. This distance prevents the samples from being considered "immediately" upstream of the site. The OEPA study did not include analysis for VOCs, some semi-VOCs and metals. Explain the value of this upstream data point.

Site sediment hazard quotients above one are shown for 1,1–dicholorethane, bromoethane, antimony, cadmium, copper, lead, 2,4-dinitrotoluene, hexachloropentadiene and other metals and SVOCs . These levels also exceed those detected in the upstream OEPA sediment station. Please explain, and address elevated contaminant levels in the risk update.

Thank you,

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